

UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF GEORGIA
ATLANTA DIVISION

IN RE: EQUIFAX, INC. CUSTOMER
DATA SECURITY BREACH
LITIGATION.

CONSUMER ACTIONS

MDL Docket No. 2800
No.: 1:17-md-2800-TWT

**APPLICATION FOR APPOINTMENT OF
THOMAS V. GIRARDI AS LEAD
COUNSEL FOR THE CONSUMER
PLAINTIFF CLASS**

Hon. Thomas W. Thrash, Jr., Presiding

Thomas V. Girardi of Girardi|Keese hereby applies to serve the consumer plaintiff class as Lead Counsel in the above-captioned case.

It is respectfully requested that the Court consider my request to be part of the leadership team in this litigation.

I represent that I truly understand the time issues and the need for a great devotion to the case to achieve an appropriate resolution.

I. RESIDENT OF LOS ANGELES

While I realize the distance between my law firm's residence in Los Angeles and Atlanta, I hereby agree, if appointed, that I will properly perform my obligations irrespective of the distance between my firm's residence and Atlanta.

I believe that in light of the fact there are probably more California claimants in the class than any other State, it would probably be appropriate to have at least one member from California for a leadership role.

II. EXPERIENCE IN LITIGATION

Although it is not my style to discuss some very nice achievements in my legal life, I believe it is appropriate since I am requesting a position of leadership.

I have been a trial lawyer for more than four decades. I have been very fortunate to have my legal efforts described in a very favorable fashion.

The *Daily Journal* is the legal newspaper for the entire State of California. Each year they publish a list of the Top 100 Lawyers in the State. I have been included on this list every year since it began ten years ago.

Our firm was honored by the *Daily Journal* six months ago to be included on a list of the Top 25 Plaintiffs' Lawyers in the State of California. I am on that list as is my partner David R. Lira and my partner Amy F. Solomon. Many lawyers and judges have responded that it is truly exceptional that one law firm has three of the best trial lawyers in California on a list of 25.

Super Lawyers is a magazine which devotes a great deal of analysis to discuss the best lawyers across the country. Each year, for the past five years, *Super Lawyers* has published a list of the Top Trial Lawyers in the State of California. I was ranked Number 1 by *Super Lawyers* for the past five years.

I apologize to put these comments on paper since normally it would not be my style to say things like this, but I believe that the recognition is important since the Court has the responsibility to select leaders that will do an excellent job.

III. THE ABILITY TO "GET ALONG" WITH OTHER LAWYERS

As the Court is well aware, there are many lawyers involved in this litigation. There

are huge numbers of clients. There are very large and complicated legal issues. Clearly, a very important role of leadership in a case like this is the ability of leadership to respect and get along with numerous lawyers who have made claims on behalf of clients. I have been pleased by the legal community in California who have acknowledged this important role of a lawyer in cases like this. I was elected and served as the national president of the American Board of Trial Advocates (an organization consisting of an equal number of plaintiff lawyers and defense lawyers). I have had the honor to be a member of the Inner Circle of Advocates since it was formed many years ago. The Inner Circle is limited to two lawyers in every State who have achieved great results for their clients. I was elected and served as president of the International Academy of Trial Lawyers. This organization is limited to 500 lawyers who represent both plaintiffs and defendants. Each lawyer is selected based upon his or her legal ability and his or her ethics, integrity and civility.

IV. EXPERIENCE IN CLASS ACTION AND CYBER BREACH TYPE CASES

I have been lead counsel in numerous class action cases involving the breach of confidentiality private documents such as this case. I am familiar with the various legal issues including standing, damages, etc. I think this background would be helpful if the Court permits me to have a leadership role in this litigation.

V. CONCLUSION

It is respectfully requested that the Court consider this application to be in a leadership role in this very complicated and very important case.

I will be attending the hearing on February 9th and will be happy to address any questions or concerns the Court may have.

Respectfully submitted

Dated: January 31, 2018



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